

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY,

Plaintiff,

vs.

CHRISTIAN EXOO a/k/a @ANTIFASH  
GORDON; et al.,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880

JOHN MICHAEL VAZQUEZ, U.S.D.J.

**APPLICATION FOR ORDER  
TO SHOW CAUSE**

Plaintiff Daniel D'Ambly (hereinafter "Plaintiff" or "Mr. D'Ambly") requests that this Court issue an Order to Show Cause compelling One People's Project to appear in this Court and show what cause it has, if any, why it should not be held in contempt for failing to comply with a subpoena duces tecum duly served on it in the matter captioned above.

**GROUND FOR RELIEF**

1. One People's Project should be ordered to show cause as to why it should not be held in contempt.

2. As shown in the accompanying motion, One People's Project is identified as the owner and registrant of Torch Antifa Network's website *www.torchantifa.org* in the internet domain registry maintained by the Internet Corporation for Assigned Names and Numbers ("ICANN").

3. On May 16, 2022, and May 23, 2022, Torch Antifa Network via the One People's Project was served a subpoena duces tecum commanding them to produce documents, things, and electronically stored information for the website *www.torchantifa.org*. A copy of the subpoena is annexed hereto as **Exhibit A**.

4. *Federal Rule of Civil Procedure 45(b)(1)* only requires that a copy of the subpoena be served on the party identified in the subpoena by a server who is 18 years of age or older and who is not a party to the action. The subpoena was duly served in full compliance with the requirements of Rule 45(b)(1).

5. The subpoena did not require any party who is not a party to appear beyond the geographical limits set out in Rule 45(c), and did not require Plaintiff to tender payment of one day's attendance fee and/or mileage fee with service of the subpoena. The information sought by this subpoena is not available elsewhere. Only Torch has or is likely to have this information.

6. One People's Project's failed to comply with the subpoena and was without adequate excuse in that no timely written objections to the subpoena duces tecum were filed, nor was a motion to quash the subpoena filed prior to the date of compliance.

7. By reason of One People's Projects failure and refusal to comply with the subpoena, Plaintiff incurred expenses and attorney's fees in preparation of the documents, things, and electronically stored information commanded by the subpoena.

8. The only appropriate remedy for this willful noncompliance with a court order is to hold One People's Project in contempt of this court until it complies with the subpoena.

**THE LAW OFFICE OF PATRICK TRAINOR, ESQ., LLC**

April 12, 2023

/s/ Patrick Trainor

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